

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

JOE ANDREW SALAZAR,

Plaintiff,

v.

AT&T MOBILITY LLC,
SPRINT/UNITED MANAGEMENT
COMPANY,
T-MOBILE USA, INC., and
CELLCO PARTNERSHIP D/B/A VERIZON
WIRELESS,

Defendants.

Civil Action No. 5:19-cv-75

JURY TRIAL DEMANDED

JOINT MOTION FOR ENTRY OF DOCKET CONTROL ORDER

Pursuant to the Court's Order (Dkt. 34), Plaintiff Joe Andrew Salazar ("Salazar") and Defendants AT&T Mobility LLC, Sprint/United Management Company, T-Mobile USA, Inc., And Cellco Partnership a/b/a Verizon Wireless ("Defendants"), (collectively, the "Parties"), submit their attached Agreed Docket Control Order for the Court's consideration and entry.

In accordance with the Court's Order, the Parties have submitted this DCO with all mandatory provisions, including the Court's mandatory deadlines. However, counsel for Defendants were previously scheduled to attend trial in another matter during the *Markman* Hearing on June 3, 2020. The Parties also jointly would prefer to extend the dispositive motion deadline to allow more time for expert discovery. For these reasons, the Parties intend to separately move the Court to amend the *Markman* hearing date and the dispositive motion deadline in a motion to follow.

In further accordance with the Court's Order, the Parties believe that the scheduling hearing is necessary to resolve disputed issues in the Proposed Discovery Order.

Dated: October 31, 2019

Respectfully submitted,

/s/ Daruish Keyhani

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 31st day of October, 2019, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Fred I. Williams

Fred I. Williams